

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$37,000.00 IN
U.S. CURRENCY,

Defendant.

2:20-MC-00281-KJM-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Hong Tran (“claimant”), by and through their respective counsel, as follows:

1. On or about September 2, 2020, claimant filed a claim in the administrative forfeiture proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 23, 2020.

2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
That deadline is December 1, 2020.

4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to February 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to February 1, 2021.

Dated: 11/20/20

McGREGOR W. SCOTT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: 11/20/20

/s/ Geoffrey G. Nathan
GEOFFREY G. NATHAN
Attorney for potential claimant
Hong Tran
(Signature authorized by email)

IT IS SO ORDERED.

Dated: November 20, 2020.


CHIEF UNITED STATES DISTRICT JUDGE